

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ENDO PHARMACEUTICALS INC.,

Plaintiff,

v.

ROXANE LABORATORIES, INC.,

Defendant.

Case No. 13-cv-3288-TPG

REDACTED
PUBLIC VERSION

**DECLARATION OF KEITH D. PARR IN SUPPORT OF ROXANE'S
OPPOSITION TO JOHNSON MATTHEY'S MOTION TO QUASH SUBPOENAS**

I, **KEITH D. PARR**, an attorney duly admitted to practice law in the State of Illinois, hereby affirm under penalty of perjury as follows:

1. I serve as one of the counsel for Roxane Laboratories, Inc. in this matter. I submit this declaration in support of Roxane's Opposition to Johnson Matthey's Motion to Quash Subpoenas.

2. Attached hereto as Exhibit 1 is a copy of Roxane's Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action dated January 31, 2014 and the Subpoena to Testify at a Deposition in a Civil Action dated January 31, 2014, with Proof of Service.

3. Attached hereto as Exhibit 2 is a copy of excerpts of Roxane's ANDA No. 200822, bearing production numbers [REDACTED]
[REDACTED]

4. Attached hereto as Exhibit 3 is a copy of the September 22, 2009 Supply Agreement entered between Roxane and Johnson Matthey Inc.

5. Attached hereto as Exhibit 4 is a copy of the First Amendment to Supply Agreement entered between Roxane and Johnson Matthey.

6. Attached hereto as Exhibit 5 is a copy of the redacted version of the Patent Purchase Agreement dated March 21, 2012 entered between Endo Pharmaceuticals and Johnson Matthey, [REDACTED].

7. Attached hereto as exhibit 6 is a copy of excerpts from the 30(b)(6) deposition of Guy Donatiello taken on February 24, 2014.

8. Attached hereto as exhibit 7 is a copy of an email [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

9. Attached hereto as exhibit 8 is a copy of an email sent by [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

10. Attached hereto as exhibit 9 is a copy of an email sent by [REDACTED]
[REDACTED]

I [REDACTED]
[REDACTED]
[REDACTED] | [REDACTED]
[REDACTED]

11. Attached hereto as exhibit 10 is a copy of an email sent [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] | [REDACTED]
[REDACTED]
[REDACTED]

12. Attached hereto as exhibit 11 is a copy of an email sent [REDACTED]

[REDACTED] | [REDACTED]
[REDACTED]
[REDACTED]

13. Attached hereto as exhibit 12 is a copy of the Declaration of Patent Interference
No. 105,893 in the United States Patent and Trademark Office effectively between Endo
Pharmaceuticals, Inc. and Mallinckrodt LLC.

14. Attached hereto as exhibit 13 is a copy of the [REDACTED]

[REDACTED]
[REDACTED]

15. Attached hereto as exhibit 14 is a copy of Dung Request for Adverse Judgment as to Count 1 claims 1-3 and 19-21 of the 7,851,482 patent.

16. Attached hereto as exhibit 15 is a copy of excerpts from the 30(b)(1) deposition of Guy Donatiello taken on February 24, 2014.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on March 21, 2014 in Chicago, Illinois.



Keith D. Parr